



LAW OFFICES

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August 14, 2023

Honorable Judge Beth E. Hanan
United States Bankruptcy Court
517 East Wisconsin Avenue
Milwaukee, WI 53202-4581

Re: Letter to Renew Motion for Relief from Stay
In re Robert C Weintz
Case# 19-30166-beh

Dear Judge Hanan:

This firm represents Deutsche Bank National Trust Company, as Trustee for Argent Securities Inc., Asset-Backed Pass-Through Certificates, Series 2006-M2 (hereinafter "Creditor") in the above referenced matter.

On January 25, 2022, the Court entered an Order which provided in paragraph 3 that Creditor may renew its Motion for Relief and Abandonment by written request for the balance of the Chapter 13 plan. A copy of the Order is attached as Exhibit A. The Debtor is currently in default in payments and our client's Motion is hereby renewed. According to our client's records, the Debtor is currently due for the 06/01/2023 through and including the 08/01/2023 post-petition payments (3 @ \$745.92 each), with arrears in the amount of \$2,687.76 which includes attorney fees in the amount of \$450.00.

By copy of this letter, we are informing the parties listed below of this Notice of Renewal. Should the Debtor or Debtor's Attorney file a written objection to the renewed Motion for Relief from the Automatic Stay and Abandonment within fourteen (14) days of the date of this letter, we respectfully request that the Court set this matter for a hearing and that proper notice of the same is provided to the appropriate parties.

Should there be no objection filed in a timely manner, the Court may enter an order granting the relief requested.

Very truly yours,

Codilis, Moody & Circelli, P.C.

/s/ Matthew Comella
Attorney for Creditor

Note: This law firm is a debt collector.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN (MILWAUKEE)**

In re:) Case No. 19-30166-beh
Robert C. Weintz) Chapter 13
)
Debtor) Judge Beth E. Hanan

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the annexed Letter to Renew Creditor's Motion for Relief from the Automatic Stay to the parties listed below, as to the Chapter 13 Trustee, U.S. Trustee and Debtor's Attorney via electronic notice on August 14, 2023 and as to the Debtor by causing same to be mailed in a properly addressed envelope, postage prepaid, from 7140 Monroe Street, Willowbrook, IL 60527 before the hour of 5:00 PM on August 14, 2023.

Scott Lieske, Chapter 13 Trustee, P.O. Box 510920, Milwaukee, WI 53203

by electronic notice through ECF

Robert C. Weintz, Debtor, W3786 Beaver Dr., Lake Geneva, WI 53147

Robert L. Crowley, Attorney for Debtor, 2323 S. 109th St., Milwaukee, WI 53227

by electronic notice through ECF

U.S. Trustee, Office of the U.S. Trustee, 517 East Wisconsin Ave., Room 430, Milwaukee, WI 53202

by electronic notice through ECF

/s/ Matthew Comella
Attorney for Creditor

Shawn R. Hillmann, WI Bar No. 1037005

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